

HEARING DATE AND TIME: June 23, 2015 at 9:45 a.m. (Eastern Time)

OBJECTION DEADLINE: June 16, 2015 at 4:00 p.m. (Eastern Time)

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*Attorneys for Motors Liquidation Company Avoidance Action Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
-----X	:	

**NOTICE OF HEARING ON MOTION OF THE MOTORS LIQUIDATION  
COMPANY AVOIDANCE ACTION TRUST, BY AND THROUGH WILMINGTON  
TRUST COMPANY ACTING SOLELY IN ITS CAPACITY AS AVOIDANCE  
ACTION TRUST ADMINISTRATOR, FOR ORDER APPROVING APPOINTMENT  
OF SUCCESSOR AVOIDANCE ACTION TRUST MONITOR**

PLEASE TAKE NOTICE that, on May 27, 2015, the Motors Liquidation Company Avoidance Action Trust (the “**Avoidance Action Trust**”), by and through Wilmington Trust Company acting solely in its capacity as Avoidance Action Trust Administrator, moved the Court for an order approving appointment of Arthur J. Gonzalez, Esq., as successor Avoidance Action Trust Monitor, and requested that a hearing (the “**Hearing**”) to consider

the Motion be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **June 23, 2015, at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on Dickstein Shapiro, LLP, attorneys for the Motors Liquidation Company Avoidance Action Trust, 1633 Broadway, New York, New York, 10019 (Attn: Barry N. Seidel, Esq., and Eric B. Fisher, Esq.), so as to be received no later than **June 16, 2015, at 4:00 p.m. (Eastern Time)** (the "**Objection Deadline**").

**PLEASE TAKE FURTHER NOTICE** that, if no responses are timely filed and served with respect to the Motion, the Avoidance Action Trust may, on or after the Response Deadline, submit to the Bankruptcy Court an order, substantially in the form of the proposed order annexed to the Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York  
May 27, 2015

/s/ Eric B. Fisher

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